

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION</p>	<p>MDL No. 2262 ECF Case</p> <p>Master File No. 1:11-md-2262-NRB ORAL ARGUMENT REQUESTED</p>
<p>THIS DOCUMENT RELATES TO:</p> <p>JOSEPH AMABILE, et al., Plaintiffs, v. BANK OF AMERICA CORPORATION, et al., Defendants.</p> <p>BAY AREA TOLL AUTHORITY, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p> <p>CEMA JOINT VENTURE, Plaintiff, v. CHARTER ONE BANK, N.A., et al. Defendants.</p> <p>CITY OF HOUSTON, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p> <p>CITY OF PHILADELPHIA, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p> <p>CITY OF RICHMOND, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	<p>No. 13-cv-1700</p> <p>No. 14-cv-3094</p> <p>No. 13-cv-5511</p> <p>No. 13-cv-5616</p> <p>No. 13-cv-6020</p> <p>No. 13-cv-0627</p>

<p>CITY OF RIVERSIDE, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	No. 13-cv-0597
<p>COUNTY OF MENDOCINO, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	No. 13-cv-8644
<p>COUNTY OF SACRAMENTO, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	No. 13-cv-5569
<p>COUNTY OF SAN DIEGO, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	No. 13-cv-0667
<p>COUNTY OF SAN MATEO, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	No. 13-cv-0625
<p>COUNTY OF SONOMA, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	No. 13-cv-5187
<p>DARBY FINANCIAL PRODUCTS, <i>et al.</i>, Plaintiffs, v. BARCLAYS BANK PLC, <i>et al.</i>, Defendants.</p>	No. 13-cv-8799

<p>EAST BAY MUNICIPAL UTILITY DISTRICT, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	<p>No. 13-cv-0626</p>
<p>FEDERAL DEPOSIT INSURANCE CORPORATION, AS RECEIVER FOR AMCORE BANK, N.A., <i>et al.</i>, Plaintiffs, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	<p>No. 14-cv-1757</p>
<p>FEDERAL HOME LOAN MORTGAGE CORPORATION, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	<p>No. 13-cv-3952</p>
<p>FEDERAL NATIONAL MORTGAGE ASSOCIATION, Plaintiff, v. BARCLAYS BANK PLC, <i>et al.</i>, Defendants.</p>	<p>No. 13-cv-7720</p>
<p>GEORGE P. MARAGOS, in his official capacity as the COMPTROLLER OF THE COUNTY OF NASSAU, acting on behalf of the COUNTY OF NASSAU, Plaintiff, v. BANK OF AMERICA CORPORATION, et al., Defendants.</p>	<p>No. 13-cv-0297</p>
<p>NATIONAL CREDIT UNION ADMINISTRATION BOARD as Liquidating Agent for U.S. Central Federal Credit Union, et al., Plaintiff, v. CREDIT SUISSE GROUP AG, et al., Defendants.</p>	<p>No. 13-cv-7394</p>

<p>PRINCIPAL FINANCIAL GROUP, INC. , <i>et al.</i>, Plaintiffs, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	No. 13-cv-6014
<p>PRINCIPAL FUNDS, INC., <i>et al.</i>, Plaintiffs, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	No. 13-cv-6013
<p>PRUDENTIAL INVESTMENT PORTFOLIOS 2, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	No. 14-cv-4189
<p>SALIX CAPITAL US INC. , Plaintiff, v. BANC OF AMERICA SECURITIES LLC, <i>et al.</i>, Defendants.</p>	No. 13-cv-4018
<p>SAN DIEGO ASSOCIATION OF GOVERNMENTS, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	No. 13-cv-5221
<p>THE CHARLES SCHWAB CORPORATION, <i>et al.</i>, Plaintiffs, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	No. 13-cv-7005
<p>THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, Plaintiff, v. BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</p>	No. 13-cv-5186

TRIAXX PRIME CDO 2006-1 LIMITED, <i>et al.</i> , Plaintiffs, v. BANK OF AMERICA CORPORATION, <i>et al.</i> , Defendants.	No. 14-cv-0146
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**DECLARATION OF JACOB J. WALDMAN IN SUPPORT OF
THE DIRECT ACTION PLAINTIFFS' OPPOSITIONS
TO DEFENDANTS' MOTIONS TO DISMISS**

Jacob J. Waldman hereby declares, under penalty of perjury:

1. I am an associate with Quinn Emanuel Urquhart & Sullivan, LLP, counsel of record for Plaintiffs Prudential Investment Portfolios 2, Salix Capital US Inc., Darby Financial Products, Capital Ventures International, the City of Philadelphia, and the Pennsylvania Intergovernmental Cooperation Authority. This declaration is to provide the Court a copy of an unpublished opinion cited in various oppositions filed by the Direct Action Plaintiffs against Defendants' motions to dismiss.

2. Attached hereto as Exhibit A is a true and correct copy of a decision of the Superior Court of New Jersey, Law Division, Essex County, in *The Prudential Insurance Company of America, et al. v. J.P. Morgan Securities LLC (f/k/a J.P. Morgan Securities Inc.), et al.*, Docket No. ESX-L-3085-12 (Super. Ct. N.J. July 18, 2013).

Dated: December 8, 2014
New York, New York



Jacob J. Waldman